

UNITED STATES BANKRUPTCY COURT  
IN THE EASTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION – FLINT

IN RE:

GENEVIEVE ALEXANDER,  
d/b/a Old Time Acres,

Debtor.

Case No. 11-33228  
Chapter 12 Proceeding  
Hon. Daniel S. Opperman

STIPULATION ALLOWING SALE OF DEBTOR'S INTEREST IN REAL PROPERTY

Now comes the Debtor, by and through her attorneys LAMBERT, LESER, ISACKSON, COOK & GIUNTA, PC, Thomas McDonald, Jr. the Chapter 12 Trustee and American Home Mortgage by and through its attorneys O'Reilly Rancilio, PC and hereby stipulate to entry of the order attached hereto as Exhibit "1" and state as follows:

1. Genevieve Alexander filed a Voluntary Petition for Relief Under Chapter 12 of the Bankruptcy Code on or about July 1, 2011.
2. During the course of the bankruptcy case, Genevieve Alexander learned that she inherited an interest in property that had been owned by her father along with her sister and brother.
3. The property is located in the Township of Forester, Sanilac County, Michigan. More fully described as:

Town 13 North, Range 16 east, Section 30, The East Half of the Southwest Quarter.

And

Town 13 North, Range 16 East, Section 30, The Northwest Quarter of the Southeast Quarter.

4. The Debtor will receive gross proceeds of \$57,000 from the sale less customary and ordinary closing costs.
5. The Debtor will pay to the Trustee the net proceeds less any amount exempt per any

remaining available exemptions which shall be held by the Chapter 12 Trustee and disbursed in accordance with a Plan to be confirmed by this Court.

6. No creditor claims a lien on the Debtors disbursements and there are no other creditors in this bankruptcy proceeding other than American Home Mortgage and the county taxing authority relative to the Debtors primary residence.

Wherefore, the parties hereby request this Honorable Court enter the order attached hereto as Exhibit "1."

Dated: March 30, 2012.

LAMBERT, LESER, ISACKSON,  
COOK & GIUNTA, PC

By: Keith A. Schofner  
KEITH A. SCHOFNER (P41852)  
Attorneys for Debtor  
916 Washington Avenue, Ste. 309  
Bay City, Michigan 48708  
(989) 893-3518  
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Dated: March 30, 2012.

O'REILLY RANCILIO PC

By: Craig S. Schoenherr, Sr.  
CRAIG S. SCHOENHERR, SR (P32245)  
Attorney for American Home Mortgage  
Sterling Town Center  
12900 Hall Road, Ste. 350  
Sterling Heights, Michigan 48313  
[ecf@orlaw.com](mailto:ecf@orlaw.com)

Dated: March 22, 2012.

U.S. BANKRUPTCY TRUSTEE

By: Thomas W. McDonald, Jr.  
THOMAS W. MCDONALD, JR. (P32464)  
Chapter 12 Trustee  
3144 Davenport  
Saginaw, Michigan 48602  
(989) 792-6766  
[Tom@mcdonald13.org](mailto:Tom@mcdonald13.org)

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Bay City, Michigan 48708  
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Attorney for American Home Mortgage  
Sterling Town Center  
12900 Hall Road, Ste. 350  
Sterling Heights, Michigan 48313  
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Dated: March 30, 2012.

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By: Thomas W. McDonald, Jr.  
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Chapter 12 Trustee  
3144 Davenport  
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Hon. Daniel S. Opperman

ORDER ALLOWING SALE OF REAL PROPERTY AS DESCRIBED IN THE  
STIPULATION ALLOWING SALE OF REAL PROPERTY

The Debtor, the Chapter 12 Trustee and American Home Mortgage consented to the sale of property described as follows:

Town 13 North, Range 16 east, Section 30, The East Half of the Southwest Quarter.

And

Town 13 North, Range 16 East, Section 30, The Northwest Quarter of the Southeast Quarter. (the "Property")

No creditor of the Debtor claims an interest in the property and the Court being otherwise advised in the premises:

IT IS NOW HEREBY ORDERED that the Debtor may grant and convey her interest in the Property to Roy C. Mosher for the gross sale price of \$57,000 less necessary and customary closing costs.